



<input type="checkbox"/>	Reveal non-public information about one or more targets or subjects of the investigation who have not been charged with a crime in the relevant investigation and such information could lead to adverse financial and/or social consequences for such person(s);
<input type="checkbox"/>	Reveal matters in violation of federal law, such as Rule 6(e) of the Federal Rules of Criminal Procedure and/or Title 26, United States Code, Section 6103;
<input type="checkbox"/>	Jeopardize national security.

Along with the above-described documents, the government is filing a redacted version of the proposed sealing order, one that has the words “filed under seal” replaced with the words “for public filing” and has the case caption redacted. The government has no objection to the public filing of this version of the proposed sealing order.

The government further requests the following:

- 1) That the government be permitted to disclose the sealed documents to appropriate law enforcement officials; and
- 2) That the Court order that the above-described documents remain under seal until further order of this Court or any court of competent jurisdiction, except that if the document(s) filed under seal relate solely to a government request for an arrest warrant, that such documents and the warrant be unsealed upon the arrest of the person to be arrested.

If this Court determines that the above-described document(s) should not be filed under seal, the government requests that the Court return the document(s) to the government without filing them publicly.

Dated: October 1, 2020

ANTOINETTE T. BACON  
Acting United States Attorney

By: /s/ Alexander P. Wentworth-Ping  
Alexander P. Wentworth-Ping  
Assistant United States Attorney  
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